

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

**STIPULATION REGARDING RENOVATION OF PALM BEACH GARDENS,
FLORIDA RESIDENCE**

The parties stipulate to the following facts:

1. Carl Sabatello is the President of Sabatello Construction of Florida, Inc., which is a construction company that operates in the Palm Beach, Florida area.
2. On November 14, 2011, Sabatello Construction of Florida, Inc. entered into a contract with Paul J. Manafort, Jr., and Kathleen Manafort with respect to the renovation of their master bathroom at their home on █ St. James Drive in Palm Beach Gardens, Florida. The contract price for the work was \$38,475.
3. As part of the payment for that renovation, on November 15, 2011, a wire transfer was made from Global Highway Limited in the amount of \$8,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Sabatello Construction of Florida, Inc.

4. As a further part of the payment for that renovation, on December 5, 2011, a wire transfer was made from Leviathan Advisors Limited in the amount of \$11,287 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to an account of Sabatello Construction of Florida, Inc.
5. As a further part of the payment for that renovation, on December 21, 2011, a wire transfer was made from Black Sea View Limited in the amount of \$20,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
6. On February 4, 2012, Sabatello Construction of Florida, Inc. entered into an additional contract with Paul and Kathleen Manafort with respect to remodeling the master bathroom and construction of an addition to the guest house at their home on █ St. James Drive in Palm Beach Gardens, Florida. The contract price for the work was \$259,300.
7. With respect to the February 4, 2012 contract, there were nine change orders reflecting additional work agreed to and signed by Sabatello Construction of Florida, Inc. and Mr. Manafort. The total cost associated with these change orders was \$133,941.
8. As part of the payment for the February 4, 2012, contract and the nine change orders, the following payments were made:
 - a. On February 9, 2012, a wire transfer was made from Global Highway Limited in the amount of \$51,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.

- b. On May 17, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$68,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- c. On June 19, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$60,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- d. On July 18, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$32,250 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- e. On September 19, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$112,000 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- f. On November 30, 2012, a wire transfer was made from Lucicle Consultants Limited in the amount of \$39,700 from a bank account at Marfin Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
- g. On January 9, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$25,600 from a bank account at Laiki Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.

- h. On February 28, 2013, a wire transfer was made from Lucicle Consultants Limited in the amount of \$4,700 from a bank account at Hellenic Bank in Nicosia, Cyprus to Sabatello Construction of Florida, Inc.
9. The records attached to this stipulation as Exhibits A through D are records of Sabatello Construction of Florida, Inc., and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

 - a. Exhibit A is a copy of the construction contract dated November 14, 2011, between Sabatello Construction of Florida, Inc. and Paul and Kathleen Manafort.
 - b. Exhibit B is a copy of the additional construction contact between Sabatello Construction of Florida, Inc. and Paul and Kathleen Manafort dated February 4, 2012.
 - c. Exhibit C are copies of the nine change orders referenced in paragraph 7.
 - d. Exhibit D are photographs of the property located at █ St. James Drive in Palm Beach Gardens, Florida.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

By: 

Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
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